<u>REMARKS</u>

In view of the following remarks, Applicant respectfully requests reconsideration and allowance of the subject application.

5   <u>Claim Amendments</u>

Claims 6, 14, 43, 50, and 53 are amended as shown above. Claims 6, 14, 43, and 50 are amended to correct typographical errors. Claim 53 is amended to correct an informality noted in the Office Action.

10   <u>Objections to the Claims</u>

Claim 53 is objected to for repeating a limitation. Claim 53 is amended as shown above to correct this informality.

<u>Rejections to the Claims</u>

15   ***35 U.S.C. 103(a)***

Claims 1, 3-32, and 34-59 are rejected under 35 U.S.C. 103(a) as being unpatentable over published U.S. Patent Application Number 2004 0175159 filed by Oetzel (herein referred to as "Oetzel") in view of U.S. Patent Number 6,925,474 issued to McGrath (herein referred to as "McGrath").

20   Applicant respectfully traverses this rejection.

Applicant describes and claims a DVD metadata wizard that determines a DVD ID associated with a DVD and searches and retrieves metadata associated with the DVD from a metadata database that is managed by a server. A user can accept the returned metadata, modify the returned

5 metadata, or enter user-supplied metadata to be associated with the DVD. The accepted, added, or edited metadata is then associated with the DVD ID and stored in a local media library. (*Application*, Summary.)

Claim 1 recites a method, comprising:

10 opening media content that is stored on a DVD;

determining a DVD ID associated with the DVD;

searching a database that contains DVD metadata based on the DVD ID;

displaying DVD metadata that is associated with the DVD ID in the database;

15 receiving an indication of a user's acceptance of the DVD metadata that is displayed; and

storing the DVD metadata that is displayed in a local media library, such that the DVD metadata is associated with the DVD ID in the local media library.

20 The combination of Oetzel and McGrath does not result in the claimed invention. Specifically, neither Oetzel nor McGrath, alone or in combination, teaches or suggests searching a database that contains DVD metadata based on the DVD ID; and storing the DVD metadata that is displayed in a local media

library, such that the DVD metadata is associated with the DVD ID in the local media library, as recited in claim 1.

Oetzel describes a DVD authoring process to simulate interactivity on limited-function playback devices, such as conventional DVD players. This is achieved by pre-processing and pre-creating the menus and other elements and then jumping from menu to menu. (*Oetzel*, Abstract.) Metadata is preprocessed before writing the material to disc and hundreds or thousands of screens can be stored along with the actual music, video, etc. content. When the disc is generated, it can be sorted by metadata tags, a library can be compiled, and the software will then assemble the various menus and place them on the disc (along with the content) in a way compatible with the player. (*Oetzel*, paragraph [0024].)

Oetzel does not teach or suggest searching a database that contains DVD metadata based on the DVD ID; and storing the DVD metadata ... in a local media library, such that the DVD metadata is associated with the DVD ID in the local media library, as claimed. Rather, as described above, Oetzel teaches a DVD authoring process that includes writing metadata to the CD along with the media content in such a way that a simulated search of metadata stored on the CD can be provided to a user.

McGrath describes a video information retrieval system that includes a server system having access to one or more databases containing metadata information relating to a plurality of video material items. The system also includes a receiver for receiving a search request from a client system and

detecting one or more video material items for which metadata information stored in at least one of the databases substantially corresponds to the search request. (*McGrath*, Abstract.) In other words, a user enters one or more keywords, which are compared to metadata found in one or more databases.

5   Based on the retrieved metadata, the user can select one or more video items that may be of interest to the user.

While the Applicant describes and claims searching a database for metadata associated with a DVD based on a DVD ID, McGrath describes essentially a reverse process of identifying video content based on a keyword

10   search of metadata associated with a plurality of video content items. Combining the teachings of Oetzel and McGrath would result in a system in which a metadata database is searched in order to identify video content of interest, and in which video content and metadata can be written to a DVD in such a way as to simulate interactive search of data stored on the DVD. This

15   differs significantly from the claimed invention, which enables searching a database that contains DVD metadata based on the DVD ID; and storing the DVD metadata that is displayed in a local media library, such that the DVD metadata is associated with the DVD ID in the local media library.

Furthermore, Applicant believes that the §103 rejection based on the

20   combination of Oetzel and McGrath is improper based on the requirement that there must be some reason, suggestion, or motivation from the prior art, as a whole, for a person of ordinary skill in the art to have combined or modified the references. *See, In re Geiger*, 2 USPQ 2d 1276, 1278 (Fed. Cir. 1987). It is

impermissible to use the claimed invention as an instruction manual or "template" to piece together the teachings of the prior art so that the claimed invention is rendered obvious. One cannot use hindsight reconstruction to pick and choose among isolated disclosures in the prior art to deprecate the claimed invention. *In re Fritch*, 23 USPQ 2d 1780, 1784 (Fed. Cir. 1992).

There is no suggestion in the prior art as a whole to combine the teachings for McGrath and Oetzel, as suggested by the Office. Accordingly, claim 1 is allowable over Oetzel in view of McGrath, and Applicant respectfully requests that the §103 rejection be withdrawn.

Claims 3-8 are allowable by virtue of their dependency on claim 1.

Independent claims 9, 23, 30, 32, and 50 are allowable for reasons similar to those stated above with reference to claim 1.

Claims 10-22, 24-29, 31, 34-45, and 51-54 are allowable by virtue of their respective dependency on claims 9, 23, 30, 32, and 50.

Claim 46 recites a system comprising:

a processor;

a memory;

a media player application stored in the memory and executed on the

5   processor for playing media content stored on a DVD;

a media library stored in the memory for maintaining DVD metadata

associated with the media content; and

a Wizard UI configured to enable a user to select DVD metadata to be

associated with the media content, the DVD metadata to be stored in the media

10   library.

Neither Oetzel nor McGrath, alone nor in combination, teach or suggest

a media player application and a media library stored in the same memory.

Oetzel describes storing metadata on a DVD along with the media content

15   (*Oetzel*, Abstract), while McGrath describes metadata stored in multiple

databases accessible via the internet (*McGrath*, column 3, lines 44-50).

Furthermore, as described above with reference to claim 1, there is no

suggestion in the prior art as a whole to combine the teachings for McGrath and

Oetzel, as suggested by the Office. Accordingly, claim 46 is allowable over

20   Oetzel in view of McGrath, and Applicant respectfully requests that the §103

rejection be withdrawn.

Claims 47-49 are allowable by virtue of their dependence on claim 46.

Claim 55 recites: one or more computer-readable media comprising computer-readable instructions which, when executed, cause a computer system to:

extract search criteria from media content stored on a DVD; and

5   perform a search based on the search criteria, the search returning a set of metadata that may be associated with the media content.

Neither Oetzel nor McGrath, alone nor in combination, teach or suggest extracting search criteria from media content stored on a DVD; and performing

10   a search based on the search criteria. As described above with reference to claim 1, Oetzel describes a DVD authoring process that stores pre-processed metadata along with content on a DVD in such a way that simulated searching of that metadata can be presented to the user, but Oetzel is very clear that there is no active searching performed, but rather just a presentation of

15   preformatted menus that will appear to the user as if searching is being performed.

Furthermore, McGrath describes searching metadata databases to find video content of interest. Because the purpose of the search is to locate the video content, McGrath clearly does not describe extracting search criteria from

20   the media content.

Accordingly, claim 55 is allowable over the combination of Oetzel and McGrath, and Applicant respectfully requests that the rejection be withdrawn.

Claim 56-59 are allowable by virtue of their dependence on claim 55.

Claims 2 and 33 are rejected under 35 U.S.C. 103(a) as being
unpatentable over Oetzel in view of McGrath, and further in view of U.S. Patent
5   Number 6,701,478 issued to Yang (herein referred to as "Yang").

Applicant respectfully traverses this rejection.

Claim 2 recites the method as recited claim 1 wherein the determining
comprises generating a 64-bit cyclical redundancy check based on data bits
10   stored on the DVD.

Claim 33 recites the method as recited in claim 32, wherein the
determining comprises generating a 64-bit cyclical redundancy check based on
data stored on the DVD.

15   Yang describes a system and method to generate a CRC (cyclic
redundancy check) value using a plurality of CRC generators operating in
parallel. (*Yang*, Abstract.)

Applicant does not believe, nor does the Office content, that Yang adds
to the teachings of Oetzel and McGrath with regard to independent claims 1
20   and 32. Accordingly, by virtue of their relative dependency on claims 1 and 32,
claims 2 and 33 are allowable over the combination of Oetzel, McGrath, and
Yang.

Conclusion

Claims 1-59 are believed to be in condition for allowance. Applicant respectfully requests reconsideration and prompt issuance of the present application. Should any issue remain that prevents immediate issuance of the

5   application, the Examiner is encouraged to contact the undersigned agent to discuss the unresolved issue.

10   Respectfully Submitted,
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     Dated: _4/4/06_

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